

REMARKS

Reconsideration of the above-identified application is respectfully requested. Clarifying amendments have been made to Claims 1, 4, 5, 10, 12, 21, 25, 28, 29, 37, and 38. Thus, Claims 1-40 remain pending in the present application.

Claims 1-16, 19, 23-27, 29-31, and 35-40 were rejected in a May 7, 2004 Office Action (hereinafter "Office Action") under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,982,362, issued to Crater (hereinafter "Crater"). Claim 17 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Crater in view of U.S. Patent No. 6,698,021 issued to Amine (hereinafter "Amine"). Claims 18 and 20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Crater in view of Amine and further in view of U.S. Patent No. 5,732,232, issued to Brush (hereinafter "Brush"). Claims 21, 28, 32, and 34 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Crater in view of U.S. Patent No. 6,504,479, issued to Lemons (hereinafter "Lemons"). Claim 22 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Crater in view of U.S. Patent No. 5,758,340, issued to Nail (hereinafter "Nail"). Claim 33 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Crater in view of U.S. Patent No. 5,086,385, issued to Launey (hereinafter "Launey"). Claims 5, 10, 12, and 14 were also objected to based on minor informalities. Applicants respectfully assert that the present application is in condition for allowance. The reasons why applicants believe the present application is in condition for allowance are discussed in detail below.

Amendments to the Specification

Amendments have been made in the originally filed specification. Specifically, the term "internetwork" has been changed to "inter-network" at page 2, line 17.

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Claim Objections

Claims 5, 10, 12, and 14 stand objected to because of minor informalities. Accordingly, Claims 5, 10, 12, and 14 have been amended to obviate the informalities. Accordingly, applicants respectfully request withdrawal of the objections to these claims.

Claim Rejections Under 35 U.S.C. § 102

Claims 1-16, 19, 23-27, 29-31, and 35-40 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Crater. Applicants respectfully traverse the rejections to these claims. A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Brothers v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 U.S.P.Q.2d. 1051, 1053 (Fed. Cir. 1987). For at least the following reasons, applicants respectfully assert that the claimed combination of features recited in Claims 1-16, 19, 23-27, 29-31, and 35-40 are neither taught nor suggested by the cited prior art.

Claim 1

Claim 1 is directed to a method for interacting with a remote device. Claim 1, as amended, recites the steps of "obtaining a request corresponding to controlling at least one identifiable remote device" and "generating a graphical user interface responsive to said request, the graphical user interface being operable to control the remote device." Embodiments of the present invention, as recited in Claim 1, allow for the removal of the graphical user interface generation requirements at the monitoring computer in a monitored network, and allows graphical user interface generation to be centralized in a server associated with a number of discrete monitoring devices in the monitored network. The centralized nature of the server allows software fixes or updates to the server or servers to be realized immediately throughout the

monitoring network, instead of installing the software on each and every monitoring computer in the network.

In contrast, Crater does not teach generating a graphical user interface responsive to a request for controlling a remote device. Instead, Crater purportedly teaches a system in which individual controllers maintain pre-determined or pre-configured web pages 40 with a set of applets for monitoring a specific device. When loaded on a monitoring computer 50, the pre-determined or pre-configured web pages 40 allow for the passive display of data via a browser. Column 8, lines 19-37. Additionally, Crater suggests that pre-determined or pre-configured web pages may be used to control specific remote devices. In both the passive monitoring and control embodiments, however, each web page is pre-configured to a specific device.

Because the web pages are device specific, Crater suggests that the controller would maintain a predefined set of applets for an attached device with each web page and would provide the predefined set of applets with the web page to a remote monitoring computer. However, the same predefined set of applets would be transmitted to the remote monitoring computer in response to each remote monitoring computer request.

As stated above, Claim 1 recites "generating a graphical user interface responsive to said request." It is clear from the foregoing that Crater fails to teach the recited combination of features of amended Claim 1. Because Crater transmits the same device specific web page containing the same predefined set of pre-configured applets for each request, Crater does not generate a graphical user interface in response to a monitoring request. Thus, applicants respectfully requests withdrawal of the pending rejection under 35 U.S.C. § 102 with regard to Claim 1. Accordingly, applicants respectfully request withdrawal of the pending rejections under 35 U.S.C. § 102 of Claims 2-16, and 19, which depend from allowable Claim 1.

Claim 2

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Claim 2 is dependent on Claim 1 and includes the added limitation that the graphical user interface is dynamically generated. As described above, Crater teaches a system in which individual controllers maintain pre-determined or pre-configured web pages 40 with predefined set of applets for monitoring a specific device. The web pages are transmitted to a remote monitoring computer upon a generalized request. Crater does not, however, generate the web pages in response to the request made by the remote monitoring computer. Thus, for at least this additional reason, Claim 2 recites a combination of features neither taught nor suggested by Crater. Accordingly, applicants respectfully request withdrawal of the § 102 rejection of Claim 2. Applicants further request withdrawal of the § 102 rejection of Claims 3-9, which depend from Claim 2.

Claim 4

Claim 4 is dependent on Claim 2 and further defines dynamically generating a graphical user interface to include: (a) identifying two or more remote devices corresponding to said request; (b) selecting a program module corresponding to each identified remote device from a plurality of program modules, said program modules operable to control said remote device; and (c) generating a single screen interface containing all program modules, said program modules operable to generate graphical user interface components corresponding to each requested remote device.

The Office Action contends that Crater teaches the data from many remote devices can be displayed together. Office Action, page 3. However, Crater further teaches that this data from many devices is linked or permanently associated with one other. See Column 9, lines 57-61 where it states "if a cluster of controllers is operationally related such that data from one is usefully combined with data from the others, each page of the cluster can contain instructions to access the other pages." These instructions to access other pages is pre-determined based on the

specific device that is monitored, not selected by the specific request of a user, as claimed in Claim 4. Thus, since the data from one or more device is linked or permanently associated, Crater fails to teach a controller that selects a program module corresponding to each identified remote device in the request from a plurality of program modules and generates a single screen interface containing all program modules.

Thus, for at least this additional reason, Claim 4 recites a combination of features neither taught nor suggested by Crater. Accordingly, applicants respectfully request withdrawal of the § 102 rejection of Claim 4. Applicants further request withdrawal of the § 102 rejection of Claim 5, which depends from Claim 4.

Claim 23

Claim 23 is directed to a computer readable medium having computer-executable instructions for performing the methods recited in Claims 1-22. For at least the reasons that were discussed above with respect to Claims 1, 2, and 4, applicants respectfully assert that Crater fails to teach or suggest the recited combinations of features of Claim 23. Thus, applicants request withdrawal of the § 102 rejection of Claim 23.

Claim 24

Claim 24 is directed to a computer system having a processor, a memory, and an operating environment. The computer system is operable to perform the methods recited in Claims 1-22. For at least the reasons that were discussed above with respect to Claims 1, 2, and 4 applicants respectfully assert that Crater fails to teach or suggest the recited combinations of features of Claim 24. Thus, applicants request withdrawal of the § 102 rejection of Claim 24.

Claim 25

Claim 25 is directed to a computer-readable medium having computer-executable components for dynamically interacting between at least one remote device and a computing

device. The computer-readable medium includes a user interface application operable to dynamically generate a graphical user interface corresponding to the remote device.

As was describe above with regard to Claim 2, Crater purportedly teaches a system in which individual controllers maintain pre-determined or pre-configured web pages 40 with s predefined set of applets for monitoring a specific device. Since the web pages are pre-determined or pre-configured with a predefined set of applets for monitoring a specific device, Crater fails to teach the graphical user interface being dynamically generated in response to a specific request. Thus, applicants respectfully assert that Crater fails to teach a user interface application that dynamically generates a graphical user interface corresponding to the remote device. Since Crater fails to teach each and every feature of Claim 25, applicants request withdrawal of the § 102 rejection of Claim 25. Accordingly, applicants respectfully request withdrawal of the pending rejections under 35 U.S.C. § 102 of Claims 26 and 27, which depend from allowable Claim 25.

Claim 29

Claim 29 is directed to a method for dynamically generating a user interface for controlling at least one remote device. The method includes the steps of "obtaining a request to control at least one pre-selected remote device" and "selecting a program module corresponding to said pre-selected remote device from a plurality of program modules in response to said request, said program module operable to control said remote device." As was described above with regard to Claim 1, Crater purportedly teaches a system in which individual controllers maintain pre-determined or pre-configured web pages 40 with predefined sets of applets for monitoring a specific device. However, Crater fails to teach that the program modules, such as applets, are selected based on the request. Additionally, because Crater is limited to teaching a

pre-defined set of applets that have a specific function, Crater fails to teach the dynamic generation of a user interface in response to the request.

It is clear from the forgoing that Crater fails to teach or suggest the recited combining of features recited in amended Claim 29, including "selecting a program module corresponding to said pre-selected remote device from a plurality of program modules in response to said request." Thus, applicants request withdrawal of the § 102 rejection of Claim 29. Accordingly, applicants respectfully request withdrawal of the pending rejections under 35 U.S.C. § 102 of Claims 30 and 31, which depend from allowable Claim 29.

Claim 35

Claim 35 is directed to a computer readable medium having computer-executable instructions for performing the methods recited in Claims 29-34. For at least the reasons that were discussed above with respect to Claims 29, applicants respectfully assert that Crater fails to teach or suggest the recited combinations of features of Claim 35. Thus, applicants request withdrawal of the § 102 rejection of Claim 35.

Claim 36

Claim 36 is directed to a computer system having a processor, a memory, and an operating environment. The computer system is operable to perform the methods recited in Claims 29-34. For at least the reasons that were discussed above with respect to Claim 29, applicants respectfully assert that Crater fails to teach or suggest the recited combinations of features of Claim 36. Thus, applicants request withdrawal of the § 102 rejection of Claim 36.

Claim 37

Claim 37 is directed to a system for dynamically generating a user interface for controlling at least one remote device. The system includes "a server computer in communication with said remote device, said server computer operable to dynamically generate

a graphical user interface based on said remote device." For at least the reasons that were discussed above with respect to Claims 2 and 25, applicants respectfully assert that Crater fails to teach or suggest the recited combination of features of Claim 37. Thus, applicants request withdrawal of the § 102 rejection of Claim 37. Accordingly, applicants respectfully request withdrawal of the pending rejections under 35 U.S.C. § 102 of Claims 38-40, which depend from allowable Claim 37.

Rejections Under 35 U.S.C. § 103(a)

Claim 17 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Crater in view of Amine. Claims 18 and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Crater in view of Amine and further in view of Brush. Claims 21, 28, 32, and 34 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Crater in view of Lemons. Claim 22 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Crater in view of Nail. Claim 33 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Crater in view of Launey. Applicants respectfully traverse the rejections to these claims.

Dependent Claims 17, 18, 20, 21, and 22

Dependent Claims 17, 18, 20, 21, and 22 depend from Claim 1, and thus, contain all of the elements of Claim 1. Therefore, for at least the same reasons as discussed above with regard to Claim 1, Claims 17, 18, 20, 21, and 22 are allowable over the cited references. Accordingly, applicants respectfully request withdrawal of the pending rejections under 35 U.S.C. § 103(a) with regard to Claims 17, 18, 20, 21, and 22.

Dependent Claim 28

Dependent Claim 28 depends from Claim 25, and thus, contains all of the elements of Claim 25. Therefore, for at least the same reasons as discussed above with regard to Claim 25,

Claim 28 is allowable over the cited references. Accordingly, applicants respectfully request withdrawal of the pending rejections under 35 U.S.C. § 103(a) with regard to Claim 28.

Dependent Claims 32-34

Dependent Claims 32-34 depend from Claim 29, and thus, contain all of the elements of Claim 29. Therefore, for at least the same reasons as discussed above with regard to Claim 29, Claims 32-34 are allowable over the cited references. Accordingly, applicants respectfully request withdrawal of the pending rejections under 35 U.S.C. § 103(a) with regard to Claims 32-34.

CONCLUSION

In light of the foregoing amendments and remarks, applicants assert that the claims of the present application recite combinations of features neither taught nor suggested by the prior art. Therefore, applicants respectfully request early and favorable action and the allowance of all pending claims. If any further questions remain, the Examiner is invited to telephone applicants' attorney at the number listed below.

Respectfully submitted,

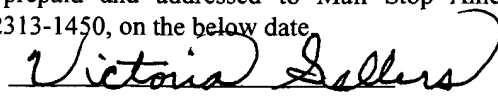
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